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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO

In re

Case No. 10-29636

David O. Kinley
XXX-XX-1484

DC No.: SNM-1

Shei M. Kinley
XXX-XX-2171

DATE: MAY 25, 2010

TIME: 9:00 A.M.

DEPT#: C - COURTROOM 35
HONORABLE JUDGE KLEIN

Debtors.

**MOTION FOR AN ORDER APPROVING ABANDONMENT OF
SDA EQUIPMENT SERVICE (A SOLE PROPRIETORSHIP)**

TO THE HONORABLE BANKRUPTCY JUDGE,

The Motion of David O. Kinley and Shei M. Kinley respectfully represents:

1. Movants filed a voluntary petition for relief under Title 11 of the United States code on April 14, 2010.
2. At the time of the entry of the order for relief debtors were in possession of the following described property: SDA Equipment Service, a sole proprietorship, located at 250 West Channel Rd #B, Benicia, CA 94510, consisting of personal property described on Schedule B and as more particularly described on debtors declaration filed herewith.
3. The property so described is claimed as exempt by the debtors under CCP 703.140(b)(6) and CCP 703.140(b)(5) and no administration by the trustee is contemplated.

23 4. Movants desire to continue to operate said business during the pending of the
24 bankruptcy proceeding and require an order of abandonment under Bankruptcy
25 Rule 6007.

26 WHEREFORE, Movant prays that the trustee in the above-stated case be required to
27 abandon said personal property and for such other and further relief as is just and proper.

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30 Dated: April 19, 2010
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30 /s/ Stephen Murphy
31 STEPHEN MURPHY
32 Attorney for Movants
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